Adrienne C. Publicover (SBN 161432)
Email: adrienne.publicover@wilsonelser.com
Sherida A. Stroble (SBN 202717
Email: sherry.stroble@wilsonelser.com
WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP
555 South Flower Street, Suite 2900
Los Angeles, California 90071
Telephone: (213) 443-5100
Facsimile: (213) 443-5101
Attorneys for Defendants
LIFE INSURANCE COMPANY OF NORTH AMERICA, an Illinois corporation, GROUP LONG TERM DISABILITY INSURANCE PLAN FOR ADMINISTAFF OF TEXAS INC. AND PARTICIPATING COMPANIES, a group Welfare benefits plan under ERISA

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

TODD NASH, an individual Plaintiff, v. LIFE INSURANCE COMPANY OF NORTH AMERICA, an Illinois corporation, GROUP LONG TERM DISABILITY INSURANCE PLAN FOR ADMINISTAFF OF TEXAS INC. AND PARTICIPATING COMPANIES, a group welfare benefits plan under ERISA, Defendant.	Case No.: 08 CV 0893 WQH (RBB) Action Filed: May 20, 2008 Judge: Hon. William Q. Hayes **PARTIES' JOINT MOTION REQUESTING AN ORDER EXTENDING THE TIME FOR DEFENDANTS TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Pursuant to Civil Local Rule 12.1, the parties, Plaintiff TODD NASH ("Plaintiff") and Defendants LIFE INSURANCE COMPANY OF NORTH AMERICA ("LINA") and GROUP LONG TERM DISABIILTY INSURANCE PLAN FOR ADMINISTAFF OF TEXAS INC. AND PARTICIPATING COMPANIES, a group welfare benefits plan under ERISA ("the Plan"), by and through their counsel of record submit this Joint Motion requesting an Order extending the time for Defendants to answer or otherwise respond to plaintiff's Complaint as follows:

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The Complaint in this action was filed on May 20, 2008. The Summons and Complaint were personally served on LINA's agent for service of process, in California, on June 3, 2008. The Summons and Complaint were served on the Plan on June 12, 2008. Accordingly, Defendants are informed and believe that LINA's response to the Complaint is due on June 23, 2008 and the Plan's response is due on July 3, 2008. The Plan tendered its defense to LINA on June 17, 2008.

Good cause exists to grant Defendants an extension of time to answer or otherwise respond to the Complaint. Defendants have two different deadlines for responding to the Complaint. It took some time for Defendant LINA to receive the Summons and Complaint from its California agent for service of process, to refer this matter to legal counsel in California, and to forward the pleadings and file to its California counsel. Defendants' attorneys of record herein, the law firm of Wilson, Elser, Moskowitz, Edelman & Dicker LLP, have recently received the Summons and Complaint for review, and have not yet received defendant Defendants' file relating to this matter. Defendants' attorneys of record herein need additional time to evaluate plaintiff's claims in this action and the potential defenses available to Defendants, and to prepare an appropriate response to the Complaint.

Plaintiff's attorney of record herein, Thomas Monson has agreed to grant Defendants an extension to answer or otherwise respond to the Complaint to, and including, July 21, 2008

For these reasons, the parties request that defendant LINA be granted an extension until, and including, July 21, 2008, to answer or otherwise respond to the Complaint in this action.

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

Dated: June 19, 2008 By: /s/ Sherida A. Stroble
Attorneys for Defendants LIFE INSURANCE COMPANY OF NORTH AMERICA and GROUP LONG TERM DISABILITY INSURANCE PLANFOR ADMINISTAFF OF TEXAS INC. AND PARTICIPATING COMPANIES

MILLER MONSON PESHEL POLACEK & HOSHAW

Dated: June 19, 2008 By: /s/Susan L. Horner
Attorneys for Plaintiff, TODD NASH

PROOF OF SERVICE

I, Sherida A. Stroble, declare that:

I am employed in the County of Los Angeles, State of California; I am over the age of 18 years and not a party to the within action; my business address 555 South Flower Street, Los Angeles, California 90071.

On June 19, 2008, I served the following document(s):

PARTIES' JOINT MOTION REQUESTING AN ORDER EXTENDING THE TIME FOR DEFENDANTS TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT

on the interested parties in this action by placing a true and correct copy thereof, enclosed in a sealed envelope addressed as follows:

08cv0893 WQH (RBB) **Notice will be electronically mailed to:**

Thomas M. Monson tommonson@erisa-law.com
Susan L. Horner susanhorner@erisa-law.com

XXX BY ELECTRONIC SUBMISSION ot the document(s) via Portable Document Format (.pdf), byt uploading such documents using the court's CM/ECF system case filing which automatically generates a Notice of Electronic or NEF which allows registered e-filers to retrieve the document(s) automatically.

Executed on June 19, 2008, at Los Angeles, California.

XXX **[FEDERAL]** I declare that I am employed in the office of a member of the bar of this court at whose direction this service was made.

/s/ Sherida A. Stroble
Sherida A. Stroble,
Attorney for Defendants